

Morton & Craig LLC  
John R. Morton, Jr., Esq.  
110 Marter Ave.  
Suite 301  
Moorestown, NJ 08057  
Telephone: 856-866-0100  
Attorney for: Lincoln Automotive Financial Services, servicer  
for CAB EAST LLC

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

In re:	)	
	)	Case No. 21-13811(MBK)
KEVIN J. O'CONNOR	)	
	)	Chapter 13
	)	Hearing date: 7-6-21
	)	
	)	
	)	OBJECTION TO CONFIRMATION
	)	
	)	

---

Lincoln Automotive Financial Services, servicer for CAB EAST LLC, the lessor of a 2019 Lincoln MKZ to the debtor, objects to the debtor's plan for the following reasons:

a. The debtor must assume the lease and pay all lease payments directly to Lincoln Automotive Financial Services in accordance with the terms of the lease and must either immediately purchase the vehicle or surrender it at lease end, and the plan must so provide.

b. The vehicle must be insured with comprehensive and collision insurance coverage and liability coverage in accordance with the requirements contained in the lease.

- c. Prepetition lease arrears must be cured promptly and paid to Lincoln Automotive Financial Services concurrently with or prior to payment of counsel fees, and in all events, prepetition arrears must be paid within 6 months of filing, OR before the lease terminates, whichever occurs first.
- d. Presently the plan **REJECTS THE LEASE AND/OR FAILS TO IDENTIFY THE LEASE.** If the lease is not assumed, the automatic stay and co-debtor stay will terminate at the conclusion of the confirmation hearing in accordance with 11 U.S.C. 365(p)(3).

/s/ John R. Morton, Jr.  
John R. Morton, Jr., attorney  
for Lincoln Automotive Financial  
Services

Dated: 5-27-21